

EXHIBIT A

Aaron K. Haar

From: Krystle Delgado, Esq <krystle@delgadoentertainmentlaw.com>
Sent: Monday, July 29, 2024 1:45 PM
To: Aaron K. Haar
Cc: Maria Crimi Speth; Delgado Entertainment Law
Subject: Re: Roberta

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Defendants have never disclosed any information related to the Texas Pregnancy Care Network. It was only by accident that we discovered anything about the Network, and only after issuing subpoenas and sending a follow up regarding Roberta, did you volunteer that Roberta was the administrator for the Network.

We are not asking for any documents at this time. So relevancy is not the issue. We are simply asking for the contact information. Obviously by your many emails now, clearly this is not information you are going to pass along, despite our multiple requests.

Sincerely,

Krystle Delgado, Esq.

DELGADO ENTERTAINMENT LAW, PLLC



KRYSTLE DELGADO, ESQ
ATTORNEY & COUNSELOR
*BUSINESS LAW, CONTRACTS, COPYRIGHT,
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From: Aaron K. Haar <akh@jaburgwilk.com>
Sent: Monday, July 29, 2024 1:29 PM
To: Krystle Delgado, Esq <krystle@delgadoentertainmentlaw.com>
Cc: Maria Crimi Speth <mcs@jaburgwilk.com>; Delgado Entertainment Law <LawTeam@delgadoentertainmentlaw.com>
Subject: RE: Roberta

Forgive me, but I have no recollection of you explaining the relevance of the Texas Pregnancy Care Network. And I still don't follow your reasoning.

Yes, Defendants asked your client to make changes based on requests from the Texas Pregnancy Care Network. So what? How do Defendants' communications with the Texas Pregnancy Care Network have anything to do with the claims/defenses at issue? You have the communications showing that Defendants requested changes. I don't follow what Defendants communications with Texas Pregnancy Care Network have to do with this case.

I'm not refusing to provide the requested information; I'm trying to figure out how it's relevant and why we should provide it.



Aaron K. Haar

Partner | Jaburg Wilk

602.248.1025 | akh@jaburgwilk.com

From: Krystle Delgado, Esq <krystle@delgadoentertainmentlaw.com>

Sent: Monday, July 29, 2024 1:18 PM

To: Aaron K. Haar <akh@jaburgwilk.com>

Cc: Maria Crimi Speth <mcs@jaburgwilk.com>; Delgado Entertainment Law <LawTeam@delgadoentertainmentlaw.com>

Subject: Re: Roberta

Aaron,

I gave you a full explanation as to why this information is relevant during our phone call on July 17th. The communications reflect that Defendants never had permission to make edits to our client's courses, and in fact, asked our client to make the edits directly.

Our inquiry deepened after receiving no response from you. To the extent that funds were ever paid from (or to) the Texas Pregnancy Care Network for use of either Plaintiff's courses or Defendant's replacement course, it is highly relevant to our claims.

Should I take it by your email that you are refusing to give us her full name and contact information?

Sincerely,

Krystle Delgado, Esq.

DELGADO ENTERTAINMENT LAW, PLLC



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From: Aaron K. Haar <akh@jaburgwilk.com>
Sent: Monday, July 29, 2024 12:47 PM
To: Krystle Delgado, Esq <krystle@delgadoentertainmentlaw.com>
Cc: Maria Crimi Speth <mcs@jaburgwilk.com>; Delgado Entertainment Law
<LawTeam@delgadoentertainmentlaw.com>
Subject: RE: Roberta

You didn't answer my question. How does the Texas Pregnancy Care Network have anything to do with the claims or defenses asserted in this matter?

From our perspective, this looks like you're trying to harass the people around our clients and impose work for the sake of imposing work.



Aaron K. Haar

Partner | Jaburg Wilk

 602.248.1025 |  akh@jaburgwilk.com

From: Krystle Delgado, Esq <krystle@delgadoentertainmentlaw.com>
Sent: Monday, July 29, 2024 12:45 PM
To: Aaron K. Haar <akh@jaburgwilk.com>
Cc: Maria Crimi Speth <mcs@jaburgwilk.com>; Delgado Entertainment Law
<LawTeam@delgadoentertainmentlaw.com>
Subject: Re: Roberta

Aaron,

Defendants have never disclosed any information about Texas Pregnancy Care Network, nor is there any record of communications between Defendants and Roberta (or any governmental agency) related to these requested changes made to our client's courses. There are only the few emails that I passed along to you July 17th between Plaintiff and Defendants.

I figured a quick call to her would be better than setting up a deposition, if a deposition is not necessary. Either way, I would appreciate you passing along her contact information.

Sincerely,

Krystle Delgado, Esq.

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From: Aaron K. Haar <akh@jaburgwilk.com>
Sent: Monday, July 29, 2024 12:17 PM
To: Krystle Delgado, Esq <krystle@delgadoentertainmentlaw.com>
Cc: Maria Crimi Speth <mcs@jaburgwilk.com>; Delgado Entertainment Law <LawTeam@delgadoentertainmentlaw.com>
Subject: RE: Roberta

Help me understand the relevance of this?



Aaron K. Haar

Partner | Jaburg Wilk

 602.248.1025 |  akh@jaburgwilk.com

From: Krystle Delgado, Esq <krystle@delgadoentertainmentlaw.com>
Sent: Monday, July 29, 2024 10:58 AM
To: Aaron K. Haar <akh@jaburgwilk.com>
Cc: Maria Crimi Speth <mcs@jaburgwilk.com>; Delgado Entertainment Law <LawTeam@delgadoentertainmentlaw.com>
Subject: Re: Roberta

Aaron,

Please provide Roberta's full legal name and contact information (email and a phone number) at your earliest convenience.

Sincerely,

Krystle Delgado, Esq.

DELGADO ENTERTAINMENT LAW, PLLC



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From: Aaron K. Haar <akh@jaburgwilk.com>
Sent: Friday, July 26, 2024 5:43 PM
To: Krystle Delgado, Esq <krystle@delgadoentertainmentlaw.com>
Cc: Maria Crimi Speth <mcs@jaburgwilk.com>; Delgado Entertainment Law <LawTeam@delgadoentertainmentlaw.com>
Subject: RE: Roberta

I was planning to respond with our comprehensive response to your letter. But I can respond now...

Roberta was the administrator for Texas Pregnancy Care Network. She approved lessons for those in her network to use. She wasn't a customer—she was the state administrator for funds that were given to pregnancy centers in Texas. Those funds were given if the center provided state approved information. To be state approved, they had to meet certain requirements, and Roberta would watch the videos and give feedback. She gave feedback about the Breastfeeding videos and requested a change (or a few) and Defendants forwarded that on to the Plaintiff, which agreed to make the change.

Not sure how any of this is relevant to the lawsuit, but there it is.

	<p>Aaron K. Haar Partner Jaburg Wilk  602.248.1025  akh@jaburgwilk.com</p>
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From: Krystle Delgado, Esq <krystle@delgadoentertainmentlaw.com>
Sent: Friday, July 26, 2024 5:37 PM
To: Aaron K. Haar <akh@jaburgwilk.com>
Cc: Maria Crimi Speth <mcs@jaburgwilk.com>; Delgado Entertainment Law <LawTeam@delgadoentertainmentlaw.com>
Subject: Re: Roberta

Aaron,

Please provide this requested information as soon as possible. Defendants have never disclosed anything related to a government agency, or this Roberta person, who was reviewing and requesting edits to our client's courses. The close of discovery is quickly approaching, and this is discoverable information that our client is entitled to. Thank you.

Sincerely,

Krystle Delgado, Esq.

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From: Krystle Delgado, Esq
Sent: Wednesday, July 17, 2024 2:56 PM
To: Aaron K. Haar <akh@jaburgwilk.com>
Cc: Maria Crimi Speth <mcs@jaburgwilk.com>; Delgado Entertainment Law <LawTeam@delgadoentertainmentlaw.com>
Subject: Roberta

Hi Aaron,

Here are a few references we were able to find related to Roberta. We are just trying to locate a last name and which government agency she is with (see NEW_0316). We did not see any of the communications between Defendants and Roberta in what was disclosed.

If you have the above information, or otherwise can point us to any emails we may have overlooked that contain this information, we would appreciate the help.

Sincerely,

Krystle Delgado, Esq.

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